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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 15-CR-00226-BLF
	)	
Plaintiff,	)	JOINT STIPULATION FOR EXCLUSION OF
	)	TIME FROM JULY 14, 2015, TO JULY 21, 2015,
v.	)	[PROPOSED] ORDER TO EXCLUDE TIME FROM
	)	JULY 14, 2015, TO JULY 21, 2015
DOUGLAS STORMS YORK,	)	
	)	
Defendant.	)	
	)	

JOINT STIPULATION

On July 14, 2015, the parties appeared before the Honorable Beth L. Freeman for a status conference on the superseding indictment in this matter. At the hearing, defense counsel informed the Court that additional time is needed to evaluate issues relating to the defendant's case, specifically regarding the superseding count. Therefore, the matter was continued until July 21, 2015 at 9:00 a.m. for further status conference.

The parties hereby stipulate that the time between July 14, 2015, and July 21, 2015, at 9:00 a.m., should be excluded from the calculation of time within which the trial in this case must commence pursuant to the Speedy Trial Act, in order to allow each counsel sufficient time to effectively prepare,

JOINT STIPULATION FOR EXCLUSION OF TIME AND [PROPOSED] ORDER TO EXCLUDE TIME  
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1 taking into account the exercise of due diligence. Furthermore, the parties stipulate that the ends of  
2 justice served by granting the request outweigh the best interest of the public and the defendant in a  
3 speedy trial.

4 DATED: July 15, 2015

Respectfully submitted,

5 MELINDA HAAG  
6 United States Attorney

7 /s/\_\_\_\_\_  
8 BRIANNA L. PENNA  
9 Special Assistant United States Attorney

10 DATED: July 15, 2015

11 /s/\_\_\_\_\_  
12 GRAHAM ARCHER  
13 Attorney for the Defendant

14 **[PROPOSED] ORDER**

15 Pursuant to the parties' motion, the Court HEREBY ORDERS that the time between July 14,  
16 2015, and July 21, 2015 be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. The Court finds,  
17 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), that the failure to grant the requested continuance  
18 would deny counsel the reasonable time necessary for effective preparation, taking into account the  
19 exercise of due diligence.

20 Furthermore, the Court finds that the ends of justice served by granting the requested  
21 continuance outweigh the best interest of the public and the defendant in a speedy trial. The Court  
22 therefore concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and  
23 (B)(iv).

24 IT IS SO ORDERED.

25  
26 DATED:\_\_\_\_\_

27 \_\_\_\_\_  
28 HON. BETH L. FREEMAN  
United States District Judge